

MELINDA HAAG (CABN 44332)
United States Attorney
MIRANDA KANE (CABN 163973)
Chief, Criminal Division
BENJAMIN TOLKOFF (NYB 4294443)
Assistant United States Attorney
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 436-7296
Facsimile: (415) 436-6982
Benjamin.Tolkoff@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 11-0536 WHA
)	
Plaintiff,)	
)	
v.)	STIPULATION AND PROPOSED ORDER
)	CONTINUING MATTER AND EXCLUDING
)	TIME UNDER 18 U.S.C. § 3161
)	
JOSEPH PERKINS,)	
)	
)	
Defendant.)	
)	

On November 1, 2011 the parties made a status appearance before the Court. The parties requested, and the Court ordered, a continuance until November 22, 2011, on which date the parties anticipate a change of plea. The stated purpose of the continuance request was to afford defense counsel adequate time to prepare.

The parties also requested, and the Court ordered, that the time between November 1 and November 22, 2011, would be excluded from the running of the speedy trial clock for effective

1 preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that, taking into
2 account the public interest in prompt disposition of criminal cases, good cause exists for this
3 extension. The parties also agreed that the ends of justice served by granting such a continuance
4 outweighed the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
5 3161(h)(7)(A).

6 SO STIPULATED:

7
8 MELINDA HAAG
United States Attorney

9
10 DATED: November 15, 2011

/s/
11 BENJAMIN P. TOLKOFF
Assistant United States Attorney
12

13 DATED: November 15, 2011

/s/
14 RONALD TYLER
Attorney for JOSEPH PERKINS

15 For the reasons stated above, this matter is continued until November 22, 2011, for a
16 change of plea or trial setting. The Court finds that the exclusion of time from November 1,
17 through November 22, 2011 is warranted and that the ends of justice served by the continuance
18 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161
19 (h)(7)(A). The failure to grant the requested continuance would deny the defendant effective
20 preparation of counsel and would result in a miscarriage of justice. 18 U.S.C. §
21 3161(h)(7)(B)(iv).

22 SO ORDERED.

23
24 DATED: November 18, 2011.


25 William Alsup
26 UNITED STATES DISTRICT JUDGE
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